

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

THE STATE OF TEXAS, et al.,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 4:20-cv-00957-SDJ

**PLAINTIFF STATES' ADVISORY REGARDING THE PARTIES'**  
**STIPULATION FOR REPRODUCTION OF DISCOVERY**

Pursuant to the Court's directive at the May 6, 2024 hearing, the Plaintiff States ("States") are conferring with Defendant Google, LLC ("Google") regarding the Parties' filing of an Amended Joint Stipulation for Reproduction of Discovery, related to discovery from parallel litigation. Despite their efforts, the Parties were not able to file an Amended Joint Stipulation as originally expected by this morning and need additional time to confer. The Parties have a meet and confer today, May 7, 2024, at 5:30 PM (Central) and have invited the Department of Justice to participate in the process. In light of the Court's remarks at yesterday's hearing, the States believe, as the Court indicated, that a joint stipulation may not be necessary under the Local and Federal Rules. But the States have provided suggested edits and a path forward for Google in the spirit of cooperation in an attempt to come to an agreement. The Parties will notify the Court of further updates and adhere to the Court's directive regarding timelines.

DATED: May 7, 2024

Respectfully submitted,

/s/ W. Mark Lanier

---

W. Mark Lanier  
Alex J. Brown  
Zeke DeRose III  
Jonathan P. Wilkerson  
**THE LANIER LAW FIRM, P.C.**  
10940 W. Sam Houston Pkwy N.  
Suite 100  
Houston, TX 77064  
Telephone: (713) 659-5200  
Facsimile: (713) 659-2204  
Email: [mark.lanier@lanierlawfirm.com](mailto:mark.lanier@lanierlawfirm.com)  
Email: [alex.brown@lanierlawfirm.com](mailto:alex.brown@lanierlawfirm.com)  
Email: [zeke.derose@lanierlawfirm.com](mailto:zeke.derose@lanierlawfirm.com)  
Email: [j.wilkerson@lanierlawfirm.com](mailto:j.wilkerson@lanierlawfirm.com)

/s/ Ashley Keller

---

Ashley Keller (*pro hac vice*)  
**KELLER POSTMAN LLC**  
150 N. Riverside Plaza  
Suite 4100  
Chicago, IL 60606  
Telephone: (312) 741-5220  
Facsimile: (312) 971-3502  
Email: [ack@kellerpostman.com](mailto:ack@kellerpostman.com)

Zina Bash (Bar No. 24067505)  
111 Congress Avenue  
Suite 500  
Austin, TX 78701  
Email: [zina.bash@kellerpostman.com](mailto:zina.bash@kellerpostman.com)

Noah S. Heinz (*pro hac vice*)  
1101 Connecticut Ave., N.W.  
11th Floor  
Washington, DC 20036  
Email: [noah.heinz@kellerpostman.com](mailto:noah.heinz@kellerpostman.com)

*Counsel for Texas, Idaho, Indiana, Louisiana (The Lanier Law Firm Only), Mississippi, North Dakota, South Carolina, and South Dakota.*

*Submitted on behalf of Plaintiff State of Texas*

**NORTON ROSE FULBRIGHT US LLP**

Joseph M. Graham, Jr.  
[joseph.graham@nortonrosefulbright.com](mailto:joseph.graham@nortonrosefulbright.com)  
Geraldine Young  
[geraldine.young@nortonrosefulbright.com](mailto:geraldine.young@nortonrosefulbright.com)  
1301 McKinney, Suite 5100  
Houston, Texas 77010  
(713) 651-5151

Marc B. Collier  
[Marc.Collier@nortonrosefulbright.com](mailto:Marc.Collier@nortonrosefulbright.com)  
98 San Jacinto Blvd., Suite 1100  
Austin, Texas 78701  
(512) 474-5201

FOR PLAINTIFF STATE OF TEXAS:

KEN PAXTON  
Attorney General

/s/ Trevor E. D. Young

Brent Webster, First Assistant Attorney  
General of Texas

Brent.Webster@oag.texas.gov

James R. Lloyd, Deputy Attorney General  
for Civil Litigation

James.Lloyd@oag.texas.gov

Trevor E. D. Young, Deputy Chief,  
Antitrust Division

Trevor.Young@oag.texas.gov

**OFFICE OF THE ATTORNEY GENERAL OF**

**TEXAS**

P.O. Box 12548  
Austin, TX 78711-2548  
(512) 936-1674

*Attorneys for Plaintiff State of Texas*

**CERTIFICATE OF SERVICE**

I certify that on May 7, 2024, this document was filed electronically in compliance with Local Rule CV-5(a) and served on all counsel who have consented to electronic service, per Local Rule CV-5(a)(3)(A).

*/s/ Mark Lanier*

---

W. Mark Lanier